

# Exhibit 10

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PENNANTIA, LLC,

Plaintiff,

v.

ROSE CAY MARITIME, LLC,  
AND DOVE CAY, LLC,  
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Case No. 25-cv-5904-SHS

**DECLARATION OF KEITH LONG**

1. My name is Keith Long and I am the Senior Director of Chartering and Marine Operations for PBF Holding Company LLC (“PBF”).
2. PBF is engaged in the business of refining and supplying petroleum products such as bunker fuel, heating oil, petrochemical feedstocks and lubricants.
3. PBF is a 50% joint venture partner in St. Bernard Renewables LLC (“SBR”), an operating biorefinery located in Louisiana.
4. My responsibilities at PBF include the oversight and management of chartering operations for SBR and movement of SBR’s biorefined product to customers.
5. The ATB LYNNE M. ROSE and RCM 270 (“Vessel”) are an articulated tug and barge which SBR has time chartered from Pennantia, LLC (“Pennantia”) pursuant to a SHELLTIME Charter Party dated May 2, 2023 (the “Charter”).
6. SBR has learned that the Vessel was arrested in Balboa by Dove Cay, LLC (“Dove Cay”), following its transit through the Panama Canal while transporting two shipments of petroleum products (240,000 bbls of Renewable Diesel).



7. Pursuant to its Discharge Orders, SBR is required to deliver the two shipments as follows:

- Carson, CA (Kinder Morgan) – August 17-18, 2025 (145,000 bbls)
- Long Beach, CA (Marathon T2) - August 19, 2025 (100,000 bbls)

8. Rose Cay Maritime, LLC, which we understand is the manager for the Vessel and for which Dove Cay acted as crewing manager, has copies of the Discharge Orders and is aware of SBR's delivery deadlines.

9. The baseline transit time from Balboa to Carson is approximately 10.5 days, a transit which may be further delayed by poor weather conditions developing in the Pacific Ocean. The arrest of the Vessel has therefore compromised SBR's ability to timely deliver its shipment to Carson and, if the arrest is allowed to continue, will completely prevent SBR from making timely deliveries of its products to Carson and Long Beach.

10. If delivery deadlines in the Discharge Orders are not met, SBR is subject to the following damages: demurrage exposure for missing laycans (the time period within which the Vessel is expected to arrive at the port and be ready for cargo operations); commercial claims by the customers for late delivery; payment delays; and, pricing exposures for missing a beneficial market. In addition, SBR will have claims against Pennantia under the Charter for damages.

11. Given the continuing harm to SBR arising from the arrest of the Vessel, and as SBR is an innocent victim in the ongoing dispute between Pennantia, RCM and Dove Cay, we asked Pennantia to bring this matter to the Court's attention in an effort to secure a prompt release of the Vessel from the pending arrest so that the current voyage may be completed and SBR's cargo can be discharged.

Pursuant to 28 U.S.C. §1746, I declare that the foregoing is true and correct under penalty of perjury.

  
Keith Long

8/6/25

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